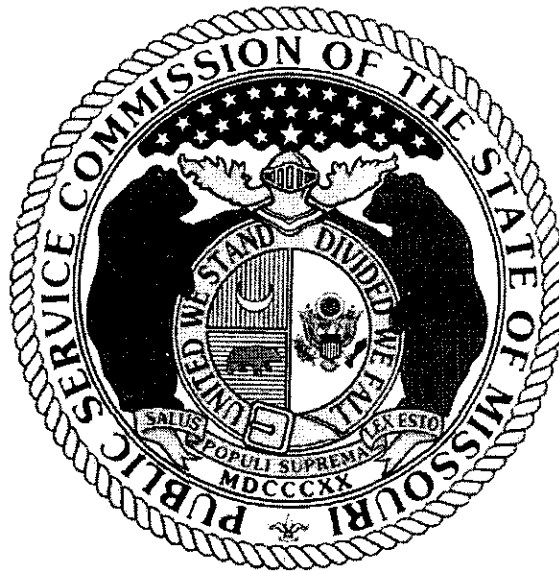


Missouri Public Service Commission

Consumer Information Roundtable



Record of Proceedings

July 24, 2003
Governor Office Building
Jefferson City, Missouri



Commissioners
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Chair
CONNIE MURRAY
STEVE GAW
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DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

MEMORANDUM

TO: Consumer Information Roundtable Discussion Groups
FROM: Wess Henderson *WJH*
SUBJECT: Record of Proceedings
DATE: August 11, 2003

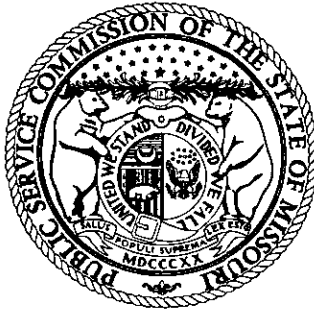
Thank you for attending the Commission's Consumer Information Roundtable session held in Jefferson City, Missouri on July 24, 2003. As promised, please find attached a bound compilation of the materials presented. This information may also be found on our Internet site at <http://www.psc.state.mo.us/>.

Our desire is to make these meetings as informative, beneficial and effective as possible. Any ideas or suggestions you may have to help us toward that end are always appreciated. Feel free to contact me at (573) 751-3684 or e-mail me at wesshenderson@psc.state.mo.us with any comments. We look forward to your attendance and active participation at future roundtable meetings.

Attachment

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Missouri Public Service Commission
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 - Electric Discussion Points
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MISSOURI PUBLIC SERVICE COMMISSION CONSUMER INFORMATION ROUNDTABLE

JULY 24, 2003

AGENDA

- | | |
|-----------------------|---|
| 8:30 a.m.-9:00 a.m. | Registration |
| 9:00 a.m.-9:10 a.m. | Welcome
Wess Henderson, Director
Utility Operations Division |
| 9:10 a.m.-9:30 a.m. | Opening Remarks
Kelvin Simmons, Chair
Missouri Public Service Commission |
| 9:30 a.m.-10:00 a.m. | State PSC Websites: A Source of Consumer Information
Debbie Bernsen, Utility Management Analyst |
| 10:00 a.m.-10:15 a.m. | Break |
| 10:15 a.m.-10:45 a.m. | Getting Information to the Public: A PSC Perspective
Kevin Kelly, Public Information Administrator |
| 10:45 a.m.-11:15 a.m. | PSC Consumer Services Top 10 List
Gay Fred, Utility Regulatory Manager |
| 11:15 a.m.-12:00 p.m. | Break-out Sessions: Utility-Specific Groups |
| 12:00 p.m.-1:00 p.m. | Lunch (On Your Own) |
| 1:00 p.m.-2:30 p.m. | Break-out Sessions |
| 2:30 p.m.-2:45 p.m. | Break |
| 2:45 p.m.-4:00 p.m. | Industry Group Reports (Room 450) |

State PUC Websites:

A Source of Consumer Information

Potential Issues

- Confidentiality
- Timeliness & accuracy
- Relevance of data
- Clear definition of what the data represents
- Ease of collecting data
- Time & personnel resources to post data
- Consumer ability to retrieve the information
- Source of data

Staff Survey of Websites General Observations

- Most states have made extensive use of their websites as a method to communicate with the consumer
- They provide information on such issues as the responsibilities of the Commission, how to file a complaint, and who their service providers are and how to contact them.

Survey Results in Six Categories

- Ability to file a complaint on line
- Availability of consumer information brochures
- Number and type of consumer complaints taken by the PSC
- Consumer Services Department activities reports
- Links to other regulatory/information sites
- Existence of retail competition for energy

Commission Web Sites

- Web Sites Table

Some Specific Findings

- Of the 50 states surveyed, 42 have specific provisions to file a consumer complaint on-line
- All but two have consumer information topics
- All but one provide a link to other useful sites such as other regulatory agencies

More Specific Findings

- A total of 18 of the 50 states posted specific information on the number and types of consumer complaints received by their Consumer Services Department
- A total of 17 of the 50 states, in lieu of complaint data or in addition to it, posted a monthly or annual report providing data and/or analysis of the activities of the Consumer Service Department

Similar But Different

- Parts are not parts

Understandable Data

- Inclusion of definitions and narratives
- Particularly important when using categories (i.e., complaint vs. inquiry, or justified vs. not justified)

Definitions of Terms

- [Wisconsin Website](#)

What Do You Call It?

- Scorecard
- Comparative rankings
- Performance measures
- Complaint statistics

Utility Scorecard

- [Illinois Website](#)

Utility Scorecard

- [Connecticut Website](#)

Dollar Amount Savings

- [Colorado Website](#)

Dollar Amount Savings

- [Florida Website](#)

Consumer Activity Reports

- Utah Website

Consumer Activity Reports

- New York Website

Consumer Activity Reports

- Pennsylvania Website

Everything is Bigger in Texas

- [Texas Website](#)

Summary

- Many different approaches exist regarding the posting of consumer complaint statistics
- Are there other types of data that could be meaningful?
- What are your thoughts ?

Providing Consumer Information



PSC Roundtable
July 24, 2003

Public Information and Education Goal: Inform & Educate

- ✦ Ratepayers
- ✦ Media
- ✦ Legislators
- ✦ Future ratepayers

We Do This Through

- ✦ Press Releases
- ✦ Information Sheets
- ✦ Local Public Hearings
- ✦ Brochures/Pamphlets
- ✦ Annual Report
- ✦ Consumer Newsletters
- ✦ Editorial Board Meetings

Press Releases

- ✦ Commission decisions
- ✦ Available on Commission website
- ✦ Media outlets/PSC press release listserve

Media Contacts

- ✦ Work with the state and national media on stories regarding activities at the Missouri Public Service Commission
- ✦ Visit various newspapers across the state (editorial board meetings) on a regular basis to inform them of Commission issues

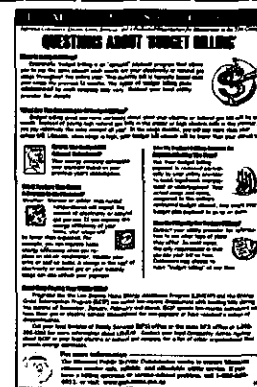
Other Consumer Issues

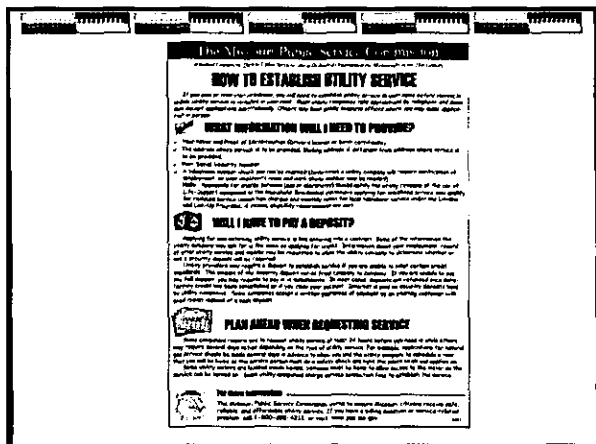
Increased consumer awareness of Public Service Commission through:

- ✦ Establishment of the EFIS system so consumers can access information in a rate case
- ✦ Webcast of Commission hearings
- ✦ Provide informational materials to the General Assembly

Information Sheets

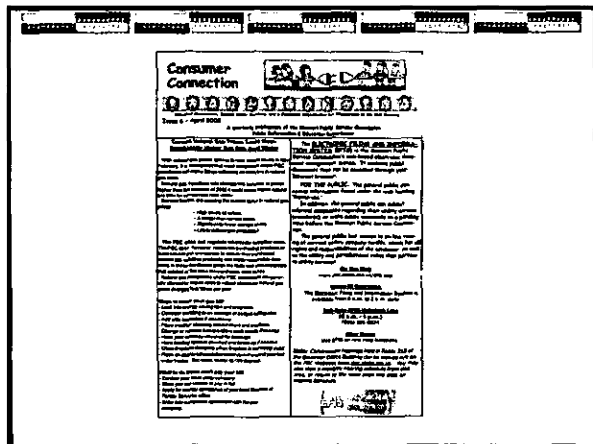
- ✦ Cover a wide range of topics (Establishing Service, Budget Billing, Cold Weather Rule)
- ✦ Distribute (via e-mail or listserve) to interested consumer groups
- ✦ Weekly hearing schedule






Consumer Newsletters

- Quarterly publication providing articles on various utility related topics (ways to cut down on your heating bill, summer energy saving tips)
- Wide distribution list



PowerTOWN®



- Gives students information on how to be safe around electricity.
- Provides a visual display of what can happen when you come in contact with a powerline.
- Students receive materials on electricity and natural gas safety

State Fair Booth

- ✦ Provide information and answer consumer questions about issues related to the Public Service Commission.
- ✦ A wide variety of informational materials are available -- most contain the PSC Consumer Services hotline number and website.

Publications

- ✦ PSC Annual Report
- ✦ PSC Reports

Publications

- ✦ Pamphlets on various subjects:
 - A Guide To The PSC
 - Manufactured Housing
 - The PSC Cold Weather Rule
 - What You Should Know About Your Natural Gas Bill

Local public hearings

Why have them:

- ✦ Consumers have an opportunity to voice their opinions on a rate case before the PSC
- ✦ Consumers provide the Commission with information if they have service related problems

Local public hearings

Key issues regarding local public hearings:

- ⚡ Consumers don't have a great deal of information on issues of case
- ⚡ Can't ask questions during the local public hearing

Information Session

- ⚡ Public Information and Education
Department conducts information session prior to the actual local public hearing
- ⚡ Consumers can ask questions and answers will be provided
- ⚡ Time given to have one-on-one conversations to get information

Information Session

- ⚡ Open forum, much less restrictive than the local public hearing
- ⚡ Go over the local public hearing process

Information Session

- ⚡ Information sheets and other consumer information materials are available
- ⚡ Consumers will be encouraged to follow the case through hearings that are webcast or reading testimony through the EFIS system.

Consumer Surveys --- A Valuable Tool to Consumer Education

2002 Survey Results

- ⚡ Awareness of the Missouri Public Service Commission is high as nearly 75% of those surveyed said they had heard of the PSC.
- ⚡ About two-thirds (66%) knew citizens could file utility complaints with the Commission.

2002 Survey Results

- ⚡ Nearly 91 percent of those surveyed showed confidence in the safety of their utility services. Responses included "ultimately government will control the issues" or "I have no reason to be worried about the safety."
- ⚡ Nearly two-thirds (65.5%) of those surveyed paid attention to utility stories in the newspaper; 75% on television; 70% on radio. Over 60% of the respondents said they talked to their friends and neighbors about issues relating to utility services.

2002 Survey Results

- ⚡ Approximately 75% of those who attended a Commission hearing in the past three years were satisfied with the way the hearings were conducted.
- ⚡ Most of the citizens who contacted the Commission indicated satisfaction with the outcome of their contact with the PSC.

2002 Survey Results

- Ninety-seven (97%) percent of the respondents wanted to talk with a live person when calling to discuss a problem with their utility.

Survey Comparison 2000-2002

- Awareness of the Missouri Public Service Commission increased to almost 75% in 2002, up from 68% recognition in the 2000 survey.
- Nearly two-thirds (66%) of the citizens knew that they could file utility complaints with the Commission. This compares with 56.4% in the 2000 survey.
- 40% were aware of Consumer Services toll-free hotline, according to 2002 survey

Open Door Policy

- Work with utility companies
- Ratepayers
- Media
- Legislature
- Goal: Increased awareness of the functions of the Public Service Commission

Consumers' Top 10 List: A MPSC Perspective



July 24, 2003

MPSC Definitions

- **Consumer Inquiry:** An issue PSC staff can resolve without contacting the utility company. Inquiries also incorporate EFIS Quick Hits that include "referrals" to other information sources on matters over which the Missouri PSC has no jurisdiction (cable television, Internet, service providers, satellite dishes, etc.).
- **Complaint:** An issue typically involving a utility billing, payment, service or safety issue that requires PSC staff to contact the utility company for mediation or resolution. It does not necessarily mean the utility has violated Commission rules and regulations or the company's tariff.



MPSC Definitions (cont.)

- Outage and Incident
 - *Since our rules currently do not define these terms consistently across utility types, this needs to be discussed.*
- **Outage**
 - **Telecommunications**
 - *A "Telecommunications Outage" is defined as a situation where at least 100 customers or several large commercial customers cannot place calls to a particular area(s) or conversely cannot receive calls because of the same network failure.*



MPSC Definitions (cont.)

- Outage
 - **Natural Gas**
 - *A "Natural Gas Outage" is defined as an event involving 100 or more residential customers, or an outage that is considered very significant (several large commercial outages or a combination of commercial and residential outages), even though it did not meet the 100 residential customer criteria.*



MPSC Definitions (cont.)

- Outage

- **Electric**

- *Electric utilities have two different types of outages - disruption of electric service to customers and electrical power plants that have had to shut down for various reasons. The regulated electric utility is required in 4 CSR 240-3.190(3) to report:*

- (B) Forced outages of any nuclear generating unit that could reasonably be anticipated to last more than three days;*



MPSC Definitions (cont.)

- Outage

- **Electric (cont.)**

- (C) Forced outages of any fossil-fueled fired generating unit which constitutes twenty percent or more of the electrical corporation's accredited capacity that reasonably could be anticipated to last longer than three days when the unit(s) is forced out due to a common occurrence;*

- (E) Loss of transmission capability that could limit the output of a generating plant.*



MPSC Definitions (cont.)

- Sewer

- An unplanned event that results in a service outage that affects: (1) the lesser of – 100 or more residential customers, or more than 10% of the customers connected to a system serving 1,000 or fewer customers; (2) several large commercial customers; or (3) any combination of several large commercial customers and residential customers. A "Sewer Outage" is not intended to include service interruptions related to scheduled system expansion, maintenance or repairs.



MPSC Definitions (cont.)

- Water

- An unplanned event that results in a service outage, or in substantially reduced water flow, water pressure or water storage levels, and which affects: (1) the lesser of – 100 or more residential customers, or more than 10% of the customers connected to a system serving 1,000 or fewer customers; (2) several large commercial customers; or (3) any combination of several large commercial customers and residential customers. A "Water Outage" is not intended to include service interruptions related to scheduled system expansion, maintenance or repairs.



MPSC Definitions (cont.)

- **Incident:**

- **Natural Gas:**

- **4 CSR 240-40.020(4) (A)** *Within two (2) hours following discovery by the operator, or as soon thereafter as practicable if emergency efforts to protect life and property would be hindered, each gas operator shall notify designated commission personnel by telephone of the following events within areas served by the operator:*

- 1. *An event that involves a release of gas involving the operator's actions or facilities, or where there is a suspicion by the operator that the event may involve a release of gas involving the operator's actions or facilities, and involves:*
 - A. *A death;*



MPSC Definitions (cont.)

- **Incident:**

- **Natural Gas-**

- B. *A personal injury involving medical care administered in an emergency room or health care facility, whether inpatient or outpatient, beyond initial treatment and prompt release after evaluation by a health care professional; or*
 - C. *Estimated property damage, including cost of gas lost, to the gas operator or others, or both, of ten thousand dollars (\$10,000) or more; or*
 - 2. *An event that is significant, in the judgment of the operator, even though it did not meet the criteria of paragraph (4)(A)1.*




MPSC Definitions (cont.)

- **Incident:**

- **Electric –**

- *In addition, the regulated electric utilities have to contact us regarding the following "incidents" (also found in 4 CSR 240-3.190(3)):*
 - *(A) Details of any accident at a power plant involving serious physical injury or death or property damage in excess of fifty thousand dollars*

(D) Reductions of coal inventory below a thirty-day supply and reduction of oil inventory below 50% of normal oil inventory.



Consumer Services Investigation (CSI) Team's Range of Work

- Receive, investigate, and respond to consumer complaints to ensure compliance with Commission rules and regulations and utility company tariffs. This involves:
 - Enforcing rules and regulations (state and federal level).
 - Assisting in the development of proposed rules and regulations and revision of existing rules and regulations, when appropriate.



CSI's Range of Work (cont.)

- Improve the complaint/appeal process for consumers by:
 - Educating consumers
 - Documenting all facts on any complaint/dispute or inquiry
 - Acting as the liaison between consumer and utility
 - Providing professional analysis (i.e., reviewing facts, bill analysis, verifying application of rules and regulations)
 - Mediating a fair and reasonable resolution for both consumer and utility



Workload Drivers

- Consumers/General Public
- Commission
- Legislature
- Federal agencies; i.e., FCC and FERC
- Utilities
 - Company Filings
 - Rate Cases
 - Merger Cases
 - Tariff Filings
- Weather



Providing Consumer Education/Information

- Provide Information Sheets
- Share "how-to" brochures we receive from utility companies
- Provide assistance on how to file a formal complaint
- Communicate with the consumer either verbally, face-to-face, email or in writing regarding their questions or concerns



Tracking Consumer Complaint/Inquiries

- EFIS is the central repository for all consumer complaints and inquiries for accessibility, reference and analysis.
 - Check status
 - Assignment
 - Metrics
 - Reports (both static and ad hoc/query)

MPSC's Complaint Resolution System

- Standardize list of complaint and resolution issues by utility type
- Identify Commission/federal violations by capturing the actual rule/statute
- Identify complaint timeline (date received and resolved)
- Provide resolution feedback to consumer and utilities involved
- Capture metrics i.e., savings to the consumer, complaints by utility type, company and geographical area

CSI Statistics FY 2003

**Complaints/Inquires by Utility Type
in descending order:**

- Telephone - 6,589
- Electric - 2,184
- Gas - 1,600
- Water - 658
- Sewer - 114



CSI Statistics FY 2003 (cont.)

FY 2003 the Consumer Services
Department handled:

Complaints - 5,895

Inquires - 7,752

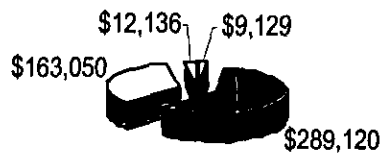
Monthly Average - 1,137



CSI Statistics FY 2003 (cont.)

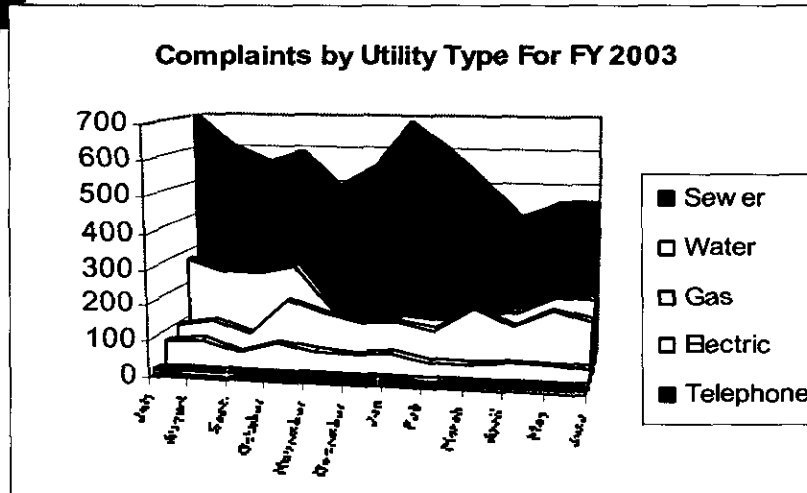
Consumer Services Department
Saved Consumers - \$473,435

Consumer Savings for FY2003



- 1st Qtr
- 2nd Qtr
- 3rd Qtr
- 4th Qtr

CSI Statistics FY 2003 (cont.)



CSI Statistics FY 2003 (cont.)

Primary Complaint Issues:

Billing

Service Quality

Violation of Rules and Regulations



Consumers Top 10 Complaint List

Complaint Sub-Issues

- | | |
|--------------------------|-----------------------------|
| 1. Seasonal Rate Changes | 6. Deposits |
| 2. Budget Billing | 7. Financial Assistance |
| 3. Calling Scopes | 8. Telemarketing |
| 4. Estimated Bills | 9. Federal Charges |
| 5. Natural Gas Prices | 10. Consumer Bill of Rights |



Proposal To Address Consumers' Top 10 List

- Work jointly in a collaborative effort to educate Missouri consumers
- Place educational materials in community centers, post offices where consumers can get access to information and ask about assistance programs
- Share weighted average utility information by customer base to consumers, community action groups, OPC, Commission and utility companies

Top 10 Strategies to Consider for Joint Collaboration

■ Open and Joint Communication

1. Complaints/Inquires
2. Rules and rule proposals
3. Tariff language and proposals
4. Up-front discussions on promotions that will benefit the consumer and how we can work as a team to educate the consumer
5. Educate MoPSC and utility staff on new services or rule and regulation changes

Top 10 Strategies to Consider for Joint Collaboration

■ Open and Joint Communication (cont.)

6. Share information between
MPSC/OPC/Utilities/Other Consumer Interest
Groups

■ Meet Periodically

7. Roundtables
8. Site Visits
9. Open door/drop-by visits



Questions?

**Telecommunications Feedback
Roundtable Meeting
July 24, 2003**

1. What types of consumer-orientated information do telecommunications companies provide to their customers?

Customer rep forms, custom calling features, consumer bill of rights, other offerings (Internet, e.g.), slamming and cramming information, telemarketing information, DIG RITE information, rate information (local service rates, optional calling packages) ← this is located in the directory of smaller local telephone companies, requirement to give customers the lowest cost available, assistance programs, list and contact information of interexchange carriers (some, but not all, companies provide this information in the directory; some companies provide this information on their web site when ordering service), ballot to pick interexchange carrier.

a. What format is this information provided?

Home page, quarterly newsletter, customer information packet, advertising, bill inserts, phone messages, phone directory information (where customers are referred to), face-to-face discussions with customers / phone conversations, prepaid companies required to give customers a 'customer information bulletin' (requirement found in a CLEC's tariff)

2. How do you notify your customers of any updates or changes regarding their telecommunications services?

Bill inserts, advertising (newspapers and other media), press releases, direct mail, postings in business office (perhaps on the door), CSRs, web site, customer information day, send reps to an area (especially for DSL launches) or customer information coffees, newsletters, county fair booths.

a. What methods have been most successful?

Direct mail (#1), bill inserts

3. Are you considering any plans that would change what information you provide and how you presently communicate with your customers?

Most companies are constantly looking at ways to improve their website and improve communications with customers.

4. What types of reporting do you maintain with the staff?

Whatever is required: Quarterly Quality of Service reports, annual reports, outage reports. Also, e-mails to the Commission's Consumer Services Department, as needed, when big changes occur.

Concerns were expressed about the cost of any additional reporting requirements.

5. What changes, if any, would you make to the current consumer-orientated telecommunications information provided on the Missouri PSC's web site?

Competitive local exchange carriers are listed as providers of basic local telecommunications service, but incumbent local exchange carriers are not listed.

Should provide links to a company's web site.

Simplify the telecom terminology used on the Commission's web site.

Ask customers what should be on the web site; don't just ask the industry.

Provide a search engine within the PSC's website.

Make it easier to select a web page that you would want to start from. Perhaps have a consumer page versus industry page when you first access the Commission's web site.

When people call the Commission's Consumer Services Department and ask for a list of telecommunications providers, make the list easy to find both visually and verbiage wise.

Should be able to select an exchange or town and get a list of all possible utilities (this capability currently exists, but has some issues associated with it.)

NENA (National Emergency Number Association) web site allows customers to input information and get a list of emergency numbers. In a similar fashion companies should be able to provide contact information or provide information pages.

Use annual report data to generate available CLECs for a region, exchange, NPA-NXX, etc.

Should somehow distinguish between active versus inactive companies (based on the company's filing of annual reports, mailings being returned / ignored, assessment paid, etc.). Give companies an option to tell PSC their status.

a. Should certain currently provided information be dropped?

b. Should certain information be added?

6. Should the Commission post telecommunications company-specific quality of service report results?

a. If yes, why?

b. If no, why not?

Consumers can't understand this information.

Currently don't get this information from all carriers.

Easily misinterpreted. For example a company might experience an ice storm that will significantly affect the number of trouble reports received by the company. Even if footnotes are provided that attempt to clarify the company experienced a significant ice storm, such information will not be read or processed by customers.

Handling trouble tickets versus quantity of trouble tickets.

Until everyone is required to submit this information, it is not fair or equitable to provide such information to the public.

The information is subject to interpretation.

What is the benefit of this information to the consumer? Has anyone requested this information?

Not the intended purpose of the Quality of Service reports.

This information will have a discriminatory impact on different size companies.

Why not instead solicit information from consumers of telco's?

Consumers currently can file complaints if dissatisfied with service.

Too much data for customers to understand.

Concern with how the data might be interpreted.

If the information shows good performance, why put it out there; it'll only confuse them.

This information will only be sought by someone who wants to use the information against the company.

Companies that provide good service will toot their own horn.

7. Should the Commission post industry-wide or aggregate quality of service report results?

a. If yes, why?

The group appears supportive of posting industry-wide or aggregate quality of service report results. There's a lot to brag about. It's good PR.

b. If no, why not?

No real objections to this idea.

8. Should the Commission post the number of complaints (i.e., "x" complaints per 1,000 subscribers) received at the Commission?

a. If yes, why?

If posted industry-wide averages, all companies would want to be above the average.

b. If no, why not?

Could do industry wide, but not on a company-specific basis.

Disgruntled former employee or customer could manipulate the system, especially for a small company.

Problems with anonymous consumers unwilling to give their address or phone number.

Calls show up as complaint if the Commission's Consumer Services Department has to contact the company.

Customers won't discern difference between justified / non-justified complaints.

Repeat complainers. Concern with how they're handled.

The term 'complaint' is misleading.

May need different treatment for rural/urban areas.

Staff analysis about complaint trends could be used to post consumer beware information on the PSC website. Should attempt to use complaint trend information in a positive way.

Would prefer company specific complaint information be given to that company so that the company can improve those areas.

Unjustified complaints or complaints without merit should not be counted against a company. Who would determine whether a complaint is justified? What if a company's count of justified complaints is different than Staff's? Appeal? Typographical / human errors?

Give companies advance copies of complaint reports in order to double check these reports.

Has any state who has posted this information done an analysis of who benefits / how much they have benefited from this information? How often could the Commission Staff update these numbers?

9. If the Commission wants to provide more consumer-orientated telecommunications information on its web site, what specific suggestions do you have?

Link to company web sites.

Identify complaint trends.

Share educational information based on complaint trends (PIC restrictions, e.g.). Companies could / should advise the Commission's Consumer Service Department of any complaint trends. Provide alerts to consumers and companies ← also alert the telephone companies. Fast response time would be needed for these sorts of information.

General information to help consumers understand rights, choices, and obligations they have. Is there a link to the slamming info sheet?

10. What general concerns or issues are raised if the Commission wants to provide more consumer-orientated telecommunications information on its web site?

See question 9 responses.

More information that is provided, the more labor intensive it is to keep that information updated, more PSC resources are being used.

If hyperlinks provided to company's website, won't have to do this twice.

All certified carriers should be treated equally in informational sheets.

Cell phone companies not receiving the same exposure (positive or negative) as these wireline companies. Perhaps give more consideration to carriers who have active phone numbers. Does the list take into consideration acquisitions and mergers? Can staff keep their list current?

Consider referring the consumer back to telephone companies for certain information.

11. Industry Summary

a. Consensus

b. Concerns

12. Should the Commission post a company's annual report?

This is unnecessary. This information (nonproprietary portion) is, or will be, available to anyone via EFIS. It seems to me that this type of information would be of little use to a consumer.

13. Should the definition for "outage" be revised?

A "Telecommunications Outage" is defined as a situation where at least 100 customers or several large commercial customers cannot place calls to a particular area(s) or conversely cannot receive calls because of the same network failure.

Potentially compare / contrast with definition of 'abnormal condition' in Chapter 32.

I'm not sure what reference defines a "telecommunications outage" as above, or where Staff intends to use this definition. Chapter 32 refers to an "abnormal condition" as 300 customers OOS for at least 30 minutes. It was not clear to me from the roundtable discussions, in what context this definition would be used.

14. Do you have any suggestions on how to address the top 10 complaint types received at the Missouri Commission?

Possibly post a Q&A formatted information sheet for each complaint type on the PSC web site. For example, the "financial assistance issue" might have information on who qualifies for it, how to apply for it, and about how much can be saved.

15. Comments regarding definitions for "Inquiry" versus "Complaint":

Inquiry: caller requests information. Company is in compliance with regulations. An inquiry could be upgraded to a complaint, if

the caller is dissatisfied with the information received. It should, however, be counted as an inquiry and a complaint.

Complaint – Justified: Caller is dissatisfied, company is not in compliance.

Complaint – Unjustified: Caller is dissatisfied, company is in compliance.



RICHARD TELTHORST
President

Celebrating 90 Years of Service
1913-2003

July 22, 2003

John Van Eschen
Manager
Telecommunications Department
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

Dear John:

Thank you for the opportunity to provide written comments for consideration during the July 24 Consumer Information Roundtable. As you know, a previously-scheduled meeting of our board of directors precludes me from attending.

Our association supports and encourages efforts by our member companies to better inform customers and the general public about the services they provide. We support efforts by public agencies that facilitate a better understanding of the variety of telecommunications products and services now available. However, we are concerned that the use of information specifically provided to the Commission to comply with state regulations could be detrimental to the industry and misleading to the public if used indiscriminately in a web-based public information effort.

Specifically, we are concerned with the publishing of quality of service reports and complaint reports made to the Commission. Both of these measurement tools have been developed for use in a regulatory framework to assist regulators in making judgements about the performance of telecommunications carriers. In particular, the required quality of service quarterly report measures performance in very specific and defined ways -- ways that would not be generally understood or appreciated by the public. For example, the public might view a company that reports 500 trouble calls in a month as providing poor service. However, regulators who understand that the trouble calls are the result of one third-party cable cut would judge the performance very differently.

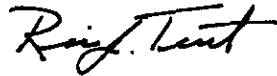
Further, we believe complaint reports received by the Commission should continue to be used as a regulatory tool, not as a public information device. The Commission staff has the ability to act as an "intelligent filter" of complaints received from the public, judging the merits and validity of each case and acting appropriately as directed by regulation. Publishing complaint reports indiscriminately on the PSC web site eliminates this

important process and will not provide the public with valid, understandable information on which to judge the performance of a carrier.

We would recommend that the Commission's public information efforts be directed toward discussing cooperative ways in which the regulated community can augment the agency's outreach programs. For example, perhaps telecommunications providers and other regulated companies could link company customer information pages through the PSC site. This would help the public find useful information about a number of utilities using the PSC web site as a gateway.

I would be glad to discuss this issue in further detail with you and your staff. Thanks once again for the opportunity to participate in the work of the Roundtable.

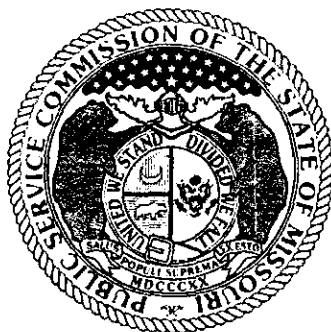
Sincerely,

A handwritten signature in black ink, appearing to read "R. Telthorst".

Richard Telthorst, CAE
President

C: Wes Henderson, Director
Utility Operations Division

**Missouri Public Service Commission
Consumer Information Roundtable
July 24, 2003**



**Industry Discussion Points –
Natural Gas Utility Group**

What types of information do you provide to your customers regarding utility services and in what format is it being provided?

Answers:

Handbook for new customers that contains all types of information including PSC contact information, phone numbers, billing information, safety information as well as links to internet sites.

Paid advertisements, bill stuffers and special mailings for specific issues (ergo. information on cold weather rule and natural gas pricing).

How do you presently notify your customers of any updates or changes regarding their utility services?

Answers:

Bill inserts, messages on postcard bill, web sites, press releases, paid advertisements (newspaper, radio, t.v. etc.), websites. Occasionally targeted mailings for special issues.

What methods have been most successful?

Answers:

Depends, because success is hard to measure. Used variety of methods as a means to reach as many people as possible. Targeted mailings for specific issues is somewhat effective but expensive. Some people disregard inserts that are not related to their bill. Paid advertising is successful in urban area but not as effective in rural areas (also expensive).

Are you considering any plans that would change what you provide and how you presently communicate with your customers?

Answers:

Using public meetings and meetings with community leaders (citizens advisory council). Meetings with community officials are not widely open to the public (targeted audience). Also, more face-to-face meetings with regulatory groups to provide for more timely and useful exchange of information.

What types of reporting do you maintain with the Staff?

Electronic Methods:

Cold weather rule information, EFIS, e-mail.

Internet Linking:

Use of Templates:

Annual reports, financial data

Mailings:

Safety reports

Reporting Time Frames:

Monthly, quarterly and annually depending on type of reporting

Telephone Communications:

Regular phone calls between interested parties in cases.

What items do you track and report internally to track your customer service quality?

Track appointments for service calls, leak response times, average talk times, commission, phone call statistics, quality index(good call, bad call) relating to

Leak calls (inside and out)

Accuracy of meter ready/bills, gallop survey on customer satisfaction,

Do you record gas outages tracking/statistics? Record when facilities get hit, when gas is turned off, customers discontinued service.

What kind of information do you believe is wanted?

Where to go to talk about complaint, get a complaint form, who to talk to etc.

Know about there service.

With numerous different utility companies it's difficult to know where to go to with in the specific company to address issues such as billing information and complaint issues.

Talk to real people within the company about concerns with service.

There is no differentiation on turn off notices between gas and electric services.

Want to know how to calculate bill (within limits), what rates are/previous rates, pending changes, tax information, comparing bills to previous years (month by month comparison)

It's not the number of complaints as much as how the complaints were resolved

What are you comfortable providing that can be posted?

Rates, tariff sheets, links to go to companies web site, collaborated effort to list companies important issues. Contact numbers on website.

What are you uncomfortable providing for being posted?

Summaries of tariff sheets (most important aspects may be overlooked).

Public complaint information that is not pertinent to the customer that may cause confusion. Information that is not carefully adjusted for customer numbers.

How do we address the confidentiality issue?

The information that is currently confidential on a utility-by-utility basis will be difficult to classify as public at this point. Careful not to release information without asking utility first and releasing information that hasn't not been cleared by Commission proceeding.

Must avoid any release on contract information and/or information that is competitively sensitive.

Industry Summary:

Consensus and Concerns:

Believe that any information that is divulged must be balanced. Any information that is given regarding complaints must be classified in terms of if the utility actually violated any rules or regulations or not. Raw complaint information that doesn't get into actual compliance with rules and regulations is not balanced. Other information reported must be carefully adjusted for factors like number of customers.

Must be careful to not make this an expensive effort without any real benefit to the customers it is targeted to inform. Information should be targeted to deal with the actual customers service and things that relate specifically to their bill – other information will be confusing and generally not be of interest to the majority of customers.

Reporting money saved is a concern in that potentially creating concerns that PSC “will save me money” when I call them. Also concerned about how some might believe that growing this trend is a good thing.

**CONSUMER INFORMATION ROUNDTABLE
DISCUSSION POINTS
ELECTRIC**

1. What types of information do you provide to your customers regarding utility services and in what format is it being provided?

The utilities present information on rates, special programs, energy conservation, billing changes, seasonal rates, major outages, and customer hookup-disconnect issues.

2. How do you presently notify your customers of any updates or changes regarding their utility services?

The utilities stated that they presently use bill messages, billing inserts, quarterly reports, press releases, and website notices. Ameren also has used bus and bus stop placards and videos to get information to different consumer groups.

a. What methods have been most successful?

The methods success really depends on the audience. The utilities stated that for things like seasonal rate changes that everyone needs to see they use bill messages or billing inserts. For things like low-income programs or weatherization, videos at social program offices or bus placards work better.

3. Are you considering any plans that would change what you provide and how you presently communicate with your customers?

The utilities stated that they were always looking at communication and how to improve it. Some of the innovative things like bus placards and video messages were discussed with interest. Distribution to libraries was suggested as way to communicate with consumers.

4. What types of reporting do you maintain with the staff?

- a. Electronic methods – email**
- b. Internet linking – none listed**
- c. Use of templates – Complaint forms**
- d. Reporting Time Frames – none listed**

5. Industry Summary

a. Consensus

All agreed that they commission would need to proceed carefully with placing a report card on our website. There would need to be a clear definition and calculation methodology for any performance standards that were used in the scorecard.

**CONSUMER INFORMATION ROUNDTABLE
DISCUSSION POINTS
ELECTRIC**

b. Concerns

Discomfort with automated voice systems and the inability of people to access a live operator was discussed. The automated system helps the utility get the correct responder to the customer by presenting choices upfront. Some utilities are utilizing technology within the call center to direct responses based upon area codes or zip codes. A convenient opt-out to a live operator was suggested as a good option.

Concerns were voiced on the use of a scorecard to rate or compare utilities, being fair to everyone involved. There was no consensus on calculating a metric that would be used in the scorecard. The use of the word 'justified' for complaints handled by the PSC had a bad connotation both for the consumer and the company.

Concern over the accumulation of dollars saved to consumers that the commission tracks, which seems to imply the utilities were doing something wrong. This metric was thought to be punitive in nature.

Reliability Indices

The use of reliability indices within an electric utility is common for setting corporate goals and measuring operational performance. Common rules for collection and definitions of indices would be necessary to get consistent data if comparison was desired. If the indices were made available to the public, education and explanation would be necessary for understanding the strengths and weakness of the values presented. Comparison would be difficult between utilities with different customer density and size of utility. A question of the audience to be targeted – consumers, journalists, regulators – and a cost/benefit to determine if providing the reliability indices was the best use of limited resources.

MO PSC Consumer Information Roundtable – July 24, 2003

Breakout Discussion Group for Water & Sewer Utilities

Agreements Reached Regarding Information to be Posted on the Commission's Website

1. Need to review the definitions of inquiry, complaint, incident and outage to make sure the differences in these terms are clear and understood.
2. Need to be able to distinguish in some fashion an outage or incident that is caused by matters not under the control of the utility – i.e. electric service outages, third-party damage to facilities, etc.
3. Need to be careful how complaint data is reported. Particularly concerned over one of the examples given of reporting "justified" vs. "non-justified" complaints (don't want to discourage people to call in by how you label and report the calls).
4. Quantification of complaint data on a "per number of customers" basis must be done differently for different sizes of companies, with special recognition of small companies.
5. Why report complaint data and/or quality of service data for industries that are not competitive, as such data would not likely affect customer decisions regarding the service?
6. Information regarding rates and service areas are most likely the most important for consumers.
7. Quality of service information, such as information regarding water and sewer company compliance with safe drinking water and clean water regulations, is not readily available as those matters are under the jurisdiction of the Department of Natural Resources.
8. Need to make sure that the effort put into the development and maintenance of information to be posted is really worth it. (What is the benefit vs. the cost?)

**MISSOURI PUBLIC SERVICE COMMISSION
CONSUMER INFORMATION ROUNDTABLE
JULY 24, 2003**

**INDUSTRY DISCUSSION POINTS
MANUFACTURED HOUSING**

1. What types of information do you provide to your customers regarding
Manufactured Housing services and in what format is it being provided?
Dealer to provide consumer with: Form 500 (Sales Contract) and other
financing documents, Waivers, Inspection List, Consumer Information Card
and Appliance Warranties and Manuals, Formaldehyde Notice, Instructions
regarding Site Preparation and other "consumer" responsibility versus dealer
responsibility information specific to each sale. Information on utility hook-
up information & responsibilities, Insulation Sheet providing "R" values.
2. How do you presently notify your customers of any updates or changes
regarding their services? Via e-mail or mailing of informational letter.
 - a. What methods have been most successful? Informational Letter
3. Are you considering any plans that would change what you provide and
how you presently communicate with your customers? Rely mostly on
letters and e-mail for customer information.
4. What types of reporting do you maintain with the staff?
 - a. Electronic methods - Yes

- b. Internet linking - Yes
- c. Use of templates - Yes
- d. Reporting Time Frames – Tracked in individual company computer program.

5. Industry Summary

- a. Consensus - No
- b. Concerns about the accuracy or legitimacy of complaints. Concern about percentage of homes sold compared to percentage of complaints received per company. When will information be posted, recommend after an inspection is conducted to ensure accuracy.

CONSUMER INFORMATION ROUNDTABLE

JULY 24, 2003

LIST OF ATTENDEES

	Name	Company Name
1.	John Buchanan	DNR – Energy Center
2.	Dale Schmick	The Pager and Phone Company
3.	Jim Ketter	MO PSC
4.	Ann Butts	Empire District Electric
5.	Jim Merciel	MO PSC
6.	Lisa Chase	Andereck, Evans, Milne, Peace & Johnson
7.	Gay Fred	MO PSC
8.	Tim Judge	SBC
9.	Sherry Myers	SBC
10.	Bruce Logan	SBC
11.	Dale Johansen	MO PSC
12.	Alane Miller	CenturyTel
13.	Becky Powell	CenturyTel
14.	Brenda Wilbers	DNR – Energy Center
15.	Janette Smith	Rock Port Telephone
16.	Anthony Paraino	Missouri American Water
17.	Steve Green	Atmos Energy
18.	Tena Hale-Rush	AquaSource
19.	Jim Busch	OPC
20.	Becky Matzdorff	Cass County Telephone
21.	Jim Cunningham	Fidelity
22.	Paul Smith	Grand River Telephone
23.	John Bushnell	N.E. MO Rural Telephone
24.	Lois Liehti	Kansas City Power and Light
25.	Nancy Moore	Kansas City Power and Light
26.	Curt Floerchinger	Aquila
27.	Judy Ness	Aquila
28.	Lori Wessley	Aquila
29.	Diana Farr	Brydon, Swearengen & England
30.	Pam Levetzow	Missouri Gas Energy
31.	Ivan Eames	Central MO Counties Human Dev. Corp.
32.	Evelyn Hawley	MO PSC
33.	Tracy Leonberger	MO PSC
34.	Robert Leonberger	MO PSC
35.	Cara Shaefer	City Utilities of Springfield
36.	Daniel Fitzpatrick	MO PSC
37.	Rob Hack	Missouri Gas Energy
38.	Anne Ross	MO PSC
39.	Bob Mill	Ameren

CONSUMER INFORMATION ROUNDTABLE

JULY 24, 2003

LIST OF ATTENDEES

40.	Wess Henderson	MO PSC
41.	Ron Pleus	MO PSC
42.	Laurie Karman	Ameren
43.	Sandi Spurbeck	Ameren
44.	Brian McCartney	Brydon, Swearengen & England
45.	Joyce Baker	Missouri Manufactured Housing Assoc.
46.	Donna Prenger	MO PSC
47.	Leo Koch	L.W. Sewer
48.	James Luther	L.W. Sewer
49.	Paul Roberts	L.W. Sewer
50.	Clyde Pratt	L.W. Sewer
51.	Mike Pendergast	Laclede
52.	Ben McReynolds	Laclede
53.	Denise Day	Mid-Mo Telephone Co.
54.	Lorinda Truex	Mid-Mo Telephone Co.
55.	Kim Bolin	Office of the Public Counsel
56.	Ruth O'Neill	Office of the Public Counsel
57.	Rick Campbell	MO PSC
58.	Cecilia Barr	MO PSC
59.	Warren Wood	MO PSC
60.	Mack McDuffey	MO PSC
61.	Kevin Kelly	MO PSC
62.	Gregg Ochoa	MO PSC
63.	Denny Williams	Aquila
64.	Adam McKinnie	MO PSC
65.	Michael Ensrud	GCI/CompTel-MO
66.	Marilyn Doerhoff	MO PSC
67.	Michelle Bocklage	MO PSC
68.	Jim Fischer	Fischer & Dority
69.	Art Kuss	MO PSC
70.	Jennifer Bosshardt	Sprint
71.	Mark Grover	Sprint
72.	John Coffman	Office of the Public Counsel
73.	Mike Dandino	Office of the Public Counsel
74.	Larry Henderson	MO PSC

Missouri Public Service Commission Consumer Information Roundtable July 24, 2003

Evaluation Results

1. Did this roundtable meet the stated objectives? Explain.
 - Yes – 9 responses
 - Yes (with comments) – 9 responses
 - Good overview of communication issues for customers
 - Very good exchange of information
 - Received information on customer service index utility concerns
 - I felt my company's issues were recognized
 - I hope if the Commission really listens to what was repeated – giving information only to be giving information – is there a demand to justify time & expense?
 - Thought everyone had an opportunity to state their thoughts
 - Full discussion of what information is provided
 - Lots of discussion
 - The stated 'industry discussion points' were thoroughly discussed during the meeting
 - Other comments – 7 responses
 - I was hoping more for actual discussion on open topics – not just Commission-oriented questions
 - I don't think so. There are no real consumers here to give feedback. The PSC should survey or focus group consumers to determine real issues
 - Not sure what those objectives were. However, I think it was a good meeting and I found new avenues to interact with the Staff
 - 'Stated objectives' unknown. However, the roundtable did meet the objectives of identifying and discussions regarding the industries' perspective of what constitutes 'consumer information'.
 - O.K. – Got some good ideas
 - Had no real objectives coming in
 - So-so
2. Facilitators were well prepared and appropriately dealt with questions and comments?
 - Yes – 13 responses

- Yes (with comments) – 5 responses
 - However, there was to some degree (perhaps unintentional) of leading responses by industry representatives.
 - Prepared – willing to listen to both sides
 - Especially Debbie Bernsen and Gay Fred
 - Thought presentations were well done
 - John worked well with the variety of companies and their views
- Other Comments – 7 responses
 - Learned much from Gay Fred's presentation. Very impressed with Debbie Bernsen's research on web sites
 - Had objectives and kept moving in that direction
 - Mostly
 - The meeting was efficiently held
 - Very much so – good presentations
 - Generally
 - I think so

3. Topics discussed that will be the most beneficial to me.

- Posting of complaint data
- Quality of service/complaint reporting
- Definitions of complaint
- Telco, electric
- All
- There were some good ideas exchanged
- Top ten consumer complaints
- Issues about providing consumers with statistical information
- EFIS information
- Telephone and gas
- More industry-suggested questions
- The majority of the topics did not address increasing consumer satisfaction with utility information
- Getting information to consumers
- Industry perspectives of consumer information: fact or myth
- Quality of service
- More public service announcements on radio and television by the Commission
- Website links
- Seeing what other states do
- I have a better understanding of what and how the complaint department does and will be better prepared to assist them
- Consistency in reporting and making sure data is reported as weighted average or in aggregate
- Understanding Commission perspective of complaints and tracking
- Breakout session – industry specific

- Issues dealing with adding information to the MPSC website
 - Additional information on PSC website, discussion about industry specific information on the website
 - Consumer information
 - Kevin Kelly's presentation. See the possibility that we can work together on customer information in the future
4. The administrative details (announcement, registration, confirmation, pre-work) of this roundtable were efficiently and effectively handled?
- Very well done
 - Good. Need more flexibility in sending out initial notices other than 'CEO'
 - Yes – 15 responses
 - Good
 - Not at all. Apparently, the notice was sent to the CEO. No one in regulatory or customer service received the notice until late through Debbie Bernsen
 - I was somewhat unsure about the objectives for the meeting
 - Neutral
 - Yes. Dawn did a great job – as usual.
 - No problem
 - O.K.
 - Sure
5. Overall, how would you evaluate this roundtable?
- Loved Kevin Kelly's presentation. Found it very informative.
 - Good
 - Good
 - Okay
 - Good
 - Good
 - Good – It is always good to meet with Staff and exchange ideas
 - Excellent
 - Very informative – well run – good topics and feedback
 - It will be very helpful to receive additional feedback about what will be done with the information gathered today
 - Very good
 - Good
 - I was disappointed. I would like to see more focus on how to get consumers concerns addressed more quickly and more satisfactorily. Consumers need to be made aware of PSC hotline. Consumers need to be

able to reach a live operator through standard 'escape route' within automated phone systems.

- Average
- Neutral. The process should allow greater consumer input on what they want to know, how, when and where – and the costs they pay for this activity.
- Good
- Very good, but too industry-concentrated. Where were consumer groups?
- Good, informative roundtable
- Very useful
- Excellent! Continue to keep up this type of dialogue.
- These types of sessions I always find beneficial. Having ideas and communicating can only lead to improvements for the customer.
- Valuable
- Effective and valuable
- Very informative
- Do one industry at a time, not all five.
- Very good; however, I brought a lot of printed information that our company has sent to customers and thought someone would want to see it. I did give it to Warren.